



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

MAY 30 2006

Mr. David Dohetry
Manager
York Casket
197 George Street
Marshfield, MO 65706

Re: York Casket, 225-0025
Permit Number: OP2006-030

Dear Mr. Dohetry:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kyra L. Moore
Permit Section Chief

KLM:ssl

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Southeast Regional Office
PAMS File: 2004-06-072



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

MEMORANDUM

MAR - 6 2006

DATE:

TO: 2004-06-072 File, The York Group, Inc., Metal Casket Assembly

FROM: Slawomir Szydlo, Environmental Engineer S S

SUBJECT: Response to Public Comments

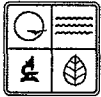
The only comments on the draft permit were from the York Casket itself. The comment letter arrived at the APCP office on February 1, 2006. The comments are addressed in the order of which they appear within the letter(s).

Comment # 1: Please be advised that York Casket plans to relocate the existing spray booth and reroute the conveyor serving the oven used to apply a primer coating to caskets during the manufacturing process at our facility.

***Response to Comment:** Since there is no definite date specified for the change, the Operating Permit will not be amended. Please be advised that change of this kind might require a Construction Permit. You are advised to contact the Construction Permit Unit before making any changes.*

Comment # 2: We wish to modify the table shown on page 3 of the (draft) permit, which includes reported air pollutant emissions for a six calendar year period (1999-2004).

***Response to Comment:** Normally we report data for only the last four years. The data for years 2001 through 2004 were amended as suggested. Data for years 1999 and 2000 were deleted from the table.*



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2006-030
Expiration Date: May 29, 2011
Installation ID: 225-0025
Project Number: 2004-06-072

Installation Name and Address

York Casket
197 George Street
Marshfield, MO 65706
Webster County

Parent Company's Name and Address

Mathews International Corporation
Two Northshore Center Pittsburgh, PA 15212-5851

Installation Description:

The installation is a manufacturer of metal caskets. Some of the operations include metal preparation, painting and finishing, and clean up. An eighth paint booth was installed under construction permit 022003-013.

MAY 30 2006

Effective Date

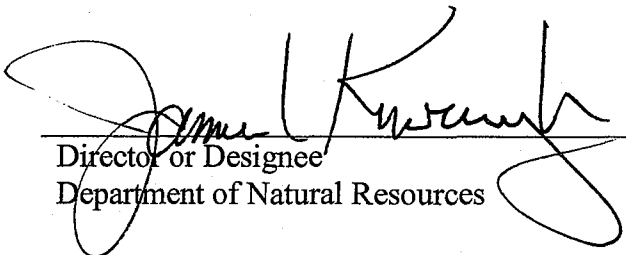

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS	3
DOCUMENTS INCORPORATED BY REFERENCE	4
II. PLANT WIDE EMISSION LIMITATIONS	5
Permit Condition PW001	5
10 CSR 10-6.060	5
Permit Condition PW002	5
10 CSR 10-6.400	5
Permit Condition PW003	6
10 CSR 10-6.220	6
Permit Condition PW004	7
40 CFR Part 63, Subpart MMMM	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
IV. CORE PERMIT REQUIREMENTS	7
V. GENERAL PERMIT REQUIREMENTS	12
PERMIT DURATION	12
GENERAL RECORD KEEPING AND REPORTING REQUIREMENTS	12
RISK MANAGEMENT PLANS UNDER SECTION 112(R)	13
SEVERABILITY CLAUSE	13
GENERAL REQUIREMENTS	13
INCENTIVE PROGRAMS NOT REQUIRING PERMIT REVISIONS	14
REASONABLY ANTICIPATED OPERATING SCENARIOS	14
TITLE IV ALLOWANCES	14
EMISSIONS TRADING	14
COMPLIANCE REQUIREMENTS	14
PERMIT SHIELD	15
EMERGENCY PROVISIONS	15
OPERATIONAL FLEXIBILITY	16
OFF-PERMIT CHANGES	16
RESPONSIBLE OFFICIAL	17
REOPENING PERMIT FOR CAUSE	17
STATEMENT OF BASIS	17
Attachment A	18
Attachment B	19

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

York Casket is a manufacturer of metal caskets. Some of the operations include metal preparation, painting and finishing, and clean up.

The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Non-HAP Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2001	3.20	0.00	0.72	71.65	0.60	0.00	38.72
2002	10.13	0.00	0.81	64.47	0.69	0.00	38.54
2003	9.51	0.00	0.87	82.89	0.71	0.00	46.23
2004	4.01	0.00	0.70	55.82	0.59	0.00	41.18

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit # Description of Emission Unit
None.

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

- Primer Coat Spray Booth
- Primer Coat Curing Oven
- Paint & Dye Mixing Area
- Color Spray Paint Booths Nos. 1, 2, 3, 4, 5, 6, 7, 8
- Brush Seal Booth
- Topcoat Spray Application System
- Flash Off Tunnel (No Heat)
- Topcoat Curing Oven
- Natural Gas – Air Make-up Units/Parts Washer Heaters (Combines All Like Units)
- Natural Gas – Curing Ovens/Process Dryer (Combines All Like Units)
- Natural Gas – Space Heaters (Combines All Like Units)
- Metal Working Casket Fabrication Area – Fugitive Emissions
- Parts Washing/Cleaning – Fugitive Emissions
- Gas Fired Process Dryer – Fugitive Emissions
- Glue Application Spray Booth (vents to building air)
- Final Paint Touch-Up Spray Booth

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit No. 022003-013 issued on January 31, 2003

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

Permit Condition PW001

10 CSR 10-6.060

Construction Permits Required, Permit No. 022003-013

Emission Limitation:

- 1) This installation shall emit less than 250 tons Volatile Organic Compounds (VOC) from the installation in any consecutive twelve (12) month period.
- 2) All paints, glues, cleaning solvents, and cleanup rags and any other material that emits VOC shall be kept in sealed containers whenever those materials are not in use.
- 3) All VOC-containing waste recovered shall be hauled off-site to an appropriate recycler.
- 4) If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, *Restriction of Emission of Odors*, the Director may require the source to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. The source shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit.

Monitoring:

The monitoring of VOC's for the installation shall be accomplished through mass balance calculations and record keeping displayed in Attachment B (or equivalent record keeping).

Recordkeeping:

This installation shall maintain an accurate record of emissions of VOC emitted into the atmosphere, and shall record the monthly and running 12-month totals of VOC emissions. Records of monthly and annual VOC emissions shall be kept on-site for the most recent 60 months. Attachment B, "VOC Compliance Worksheet", is suitable for this purpose. A form of the company's own design may be used instead of the attached form, provided all the requested information is logged. These records shall be made available immediately to the Department of Natural Resources' personnel upon verbal request.

Reporting:

This installation shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month during which the 12-month cumulative total records show that the source exceeded the limitation specified in Emission Limitation Number 1.

Permit Condition PW002

10 CSR 10-6.400

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

The filter control devices as listed in the 2003 EIQ (listed below) shall be operated and maintained at all times within the manufacturer specifications to achieve the efficiencies of PM control listed in the EIQ. Replacement filters shall be kept on hand at all times and be made of fibers appropriate for the operating conditions that are expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). The filters shall be replaced as necessary by visual inspection. The filter control devices (ATIOSM Dry Filters) as listed in the 2003 EIQ are for: Primer Coat Spray Booths (CD-2A-2B), Color Spray Paint Booths (CD-3A-3F, CD-3H-3I), Top Coat Spray Application System (CD-4A-4C), Glue Application Spray Booth (CD-5A), and Final Paint Touch-Up Spray Booth (CD-5B).

Monitoring:

Routine surveillance of control devices performed by York Casket personnel, recording of any equipment malfunctions, and periodic DNR inspections.

Recordkeeping:

York Casket shall maintain records of any equipment malfunction, the date fabric filters are changed out and the on-hand inventory of the fabric filters.

Reporting:

The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance.

Permit Condition PW003

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No person may discharge into the ambient air from any single new source of emission whatsoever, any air contaminant of a shade or density equal to or darker than 20% opacity.
- 2) Exception: No person shall discharge into the atmosphere from any source of emission any air contaminant greater than 60% visible opacity for a period in excess of six (6) minutes in any consecutive sixty (60) minute period.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission units at the installation using procedures like those contained in USEPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a. Weekly observations shall be conducted for a minimum of twenty four (24) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b. Observations must be made once every two weeks for a period of twenty four (24) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record keeping:

- 1) The permittee shall maintain records of all observation results, noting:
 - a. Whether any air emissions (except for water vapor) were visible from the emission units,
 - b. All emission units from which visible emissions occurred, and
 - c. Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions.
- 3) The permittee shall maintain records of any other Method 9 test performed in accordance with this permit condition.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or an exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or an exceedance of this regulation.

Permit Condition PW004

40 CFR Part 63, Subpart M

National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Emission Limitation:

The permittee shall meet all applicable requirements of 40 CFR Part 63, Subpart M, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products" as of the compliance date of this rule [presently stated to be January 2, 2007], and shall meet all applicable, ongoing requirements beyond the compliance date, including those as may pertain to testing, notifications, and reporting.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

None

IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions

- (a.) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
- (1.) Name and location of installation;
 - (2.) Name and telephone number of person responsible for the installation;
 - (3.) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - (4.) Identity of the equipment causing the excess emissions;
 - (5.) Time and duration of the period of excess emissions;
 - (6.) Cause of the excess emissions;
 - (7.) Air pollutants involved;
 - (8.) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - (9.) Measures taken to mitigate the extent and duration of the excess emissions; and
 - (10.) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

- (b.) The permittee shall submit the paragraph (a.) information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- (c.) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (a.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- (d.) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- (e.) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060, Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065, Operating Permits

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants

40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

- (a) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- (b) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information

- (a.) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- (b.) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.

- (c.) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150, Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- (a.) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or used of a road, driveway or open area; or operations of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found of surfaces beyond the property line or origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director,
- (b.) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- (c.) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary.

10 CSR 10-6.180, Measurement of Emissions of Air Contaminants

- (a.) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- (b.) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- (c.) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to

monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

10 CSR 10-6.280, Compliance Monitoring Usage

- (a.) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
- (1.) Monitoring methods outlined in 40 CFR Part 64;
 - (2.) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - (3.) Any other monitoring methods approved by the director.
- (b.) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
- (1.) Monitoring methods outlined in 40 CFR Part 64;
 - (2.) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - (3.) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- (c.) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- (1.) Applicable monitoring or testing methods, cited in:
 - 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - 10 CSR 10-6.040, "Reference Methods";
 - 10 CSR 10-6.070, "New Source Performance Standards";
 - 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - (2.) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

10 CSR 10-3.030, Open Burning Restrictions

- (a.) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- (b.) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- (c.) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
- (1.) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - (2.) The schedule of burning operations;
 - (3.) The exact location where open burning will be used to dispose of the trade wastes;
 - (4.) Reasons why no method other than open burning is feasible; and
 - (5.) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.

- (d.) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt York Casket from the provisions of any other law, ordinance or regulation.
- (e.) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090, Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone

- (a.) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - (1.) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - (2.) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - (3.) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - (4.) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- (b.) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - (1.) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - (2.) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - (3.) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - (4.) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - (5.) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - (6.) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- (c.) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- (d.) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

V. General Permit Requirements

Permit Duration

10 CSR 10-6.065(6)(C)1.B.

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

I) Record Keeping

- A) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- B) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

II) Reporting

- A) The permittee shall submit a report of all required monitoring by:
 - 1) October 1st for monitoring which covers the January through June time period, and
 - 2) April 1st for monitoring which covers the July through December time period.
 - 3) Exception: Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- B) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- C) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- D) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - 1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - 2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- 3) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
 - 4) These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- E) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- F) The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plans Under Section 112(r)

10 CSR 10-6.065(6)(C)1.D.

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

Severability Clause

10 CSR 10-6.065(6)(C)1.F.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements

10 CSR 10-6.065(6)(C)1.G.

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(6)(C)1.H.

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(6)(C)1.I.

None

Title IV Allowances

Not Applicable

Emissions Trading

10 CSR 10-6.065(6)(C)1.J.

Not Applicable

Compliance Requirements

10 CSR 10-6.065(6)(C)3.

- I) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- II) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - A) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - B) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - C) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - D) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- III) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - A) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - B) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- IV) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and

excursions must be included in the compliance certifications. The compliance certification shall include the following:

- A) The identification of each term or condition of the permit that is the basis of the certification,
- B) The current compliance status, as shown by monitoring data and other information reasonably available to the installation,
- C) Whether compliance was continuous or intermittent,
- D) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
- E) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Permit Shield

10 CSR 10-6.065(6)(C)6.

- I) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - A) The applicable requirements are included and specifically identified in this permit; or
 - B) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- II) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - A) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - B) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - C) The applicable requirements of the acid rain program,
 - D) The administrator's authority to obtain information, or
 - E) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(6)(C)7.

- I) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - A) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - B) That the installation was being operated properly,
 - C) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - D) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- II) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Operational Flexibility

10 CSR 10-6.065(6)(C)8.

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program and the Administrator at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- I) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - A) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program and to the Administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, The permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.
 - B) The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(6)(C)9.

- I) Except as noted below, The permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - A) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; The permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - B) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - C) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - D) The permit shield shall not apply to these changes.

Responsible Official

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by David Dohetry, Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening Permit For Cause

10 CSR 10-6.065(6)(E)6.

In accordance with 10 CSR 10-6.065(6)(E)6.A., this permit may be reopened with cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

10 CSR 10-6.170 Compliance Demonstration Fugitive Emission Observations

This recordkeeping sheet or an equivalent sheet may be used to meet the recordkeeping requirements for Permit Condition PW001.

[illegible]

Attachment B

VOC Compliance Worksheet

This recordkeeping sheet or an equivalent sheet may be used to meet the recordkeeping requirements for Permit Condition PW002.

York Casket
Webster County, S9, T30, R18
Project Number: 2002-12-016
Installation ID Number: 225-0025
Permit Number: 022003-013

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Column A Type of Material ¹	Column B Amount of Material Used (gallons)	Column C Weight % VOC	Column D Density (lb/gal)	Column E Monthly VOC Emissions ² (tons)
Total VOC Emissions Calculated for this Month				
12-Month VOC Emissions Total from Previous Month's Worksheet ³				
Monthly VOC Emissions Total from Previous Year's Worksheet				
Current 12-Month Total VOC Emissions ⁴				
¹ Include all VOC containing material used at the installation ² Column B x (Column C) / 100 x Column D x 0.0005 ³ Running 12-Month total of VOC emissions from previous month's worksheet reported for this month in the last calendar year ⁴ Current month's emissions + last 12 months emissions – emissions from the same month last year. Total of less than 250 tons indicates compliance				

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Renewal Application, received June 22, 2004;
- 2) Construction Permit No. 0392-009.
- 3) Construction Permit No. 1093-009 issued on October 17, 1993
- 4) Construction Permit No. 0894-020 issued on August 4, 1994
- 5) Construction Permit No. 0295-013 issued on February 10, 1995
- 6) Construction Permit No. 0295-013A issued on May 15, 1995
- 7) Construction Permit No. 1197-011 issued on October 17, 1997
- 8) 2003 Emissions Inventory Questionnaire, received April 1, 2004;
- 9) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule has been determined to not be applicable to the installation. All the combustion equipment at the installation is rated at less than 10 MMBTU/hr and combust only natural gas. The combustion equipment will not trigger any of the limits of this rule. In addition, 10 CSR 10-6.065, *Operating Permits*, section (3)(E) exempts this equipment from the requirements of 10 CSR 10-6.065, *Operating Permits*.

Construction Permit Revisions

This installation does not currently have any construction permits that have undergone revisions. All construction permits that have been issued to the permittee have been incorporated by reference into this Title V Permit.

NSPS Applicability

40 CFR Part 60, Subpart VVV, *Standards of Performance for Polymeric Coating of Supporting Substrates Facilities*

The regulation is not applicable to this installation because the installation does not qualify in the definition of "web coating" for polymeric coating of supporting substrates.

MACT Applicability

40 CFR Part 63, Subpart M, *National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

The requirements of this rule are listed in the Plant Wide Emissions Limitations section of the operating permit. The specific requirements that York Casket will be subject to for this standard are pending York Casket's preferred compliance option, for which York Casket must be in compliance with by January 2, 2007.

NESHAP Applicability

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos*

The requirements of this rule have been summarized and listed in the Core Permit Requirements section of the operating permit.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that meets all of the following:

- Be subject to an emission limitation or standard, and
- Use a control device to achieve compliance, and
- Have pre-control emissions that exceed or are equivalent to the major source threshold.

CAM does not apply since the facility does not use a control device for a pollutant (VOC) specific emission unit.

Other Regulatory Determinations

- 1) The installation is not subject to 40 CFR Part 68, Risk Management Program.
- 2) The glue application spray booth no longer vents through the stack, instead, it vents to building air. Therefore, it is no longer an emission source. The facility has blocked the stack and agreed to not use or reattach the stack to the booth.
- 3) **Responsible Official**
The renewal application for this Operating Permit states that the responsible official is Tim Olson. However, upon discussions with York Casket, Mr. Olson is no longer the responsible official. As such, this permit incorporates the updated responsible official, who is David Doherty, Manager. York Casket should submit a formal notification to MDNR noting this change.

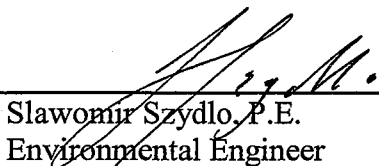
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:



Slawomir Szydlo, P.E.
Environmental Engineer